

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CASA EXPRESS CORP, as Trustee of CASA
EXPRESS TRUST,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

18 Civ. 11940

[rel. 19-cv-3123 & 19-cv-11018]

**STIPULATION AND PROPOSED
ORDER FOR SETTLEMENT OF
ATTORNEY’S FEES AND COSTS**

WHEREAS the Court, on October 16, 2020, entered judgment in favor of Casa Express and against the Republic (ECF No. 77, the “Judgment”);

WHEREAS the Judgment provides for an award of “attorney’s fees and costs in an amount to be determined” (Ibid.);

WHEREAS the Court directed Casa Express to submit a motion for the same by October 30, 2020 (ECF No. 75 at 15);

WHEREAS the Court, on October 28, 2020, extended that deadline to November 20, 2020 (ECF No. 79);

WHEREAS Casa Express has provided the Republic detailed records itemizing the time and expenses incurred by its attorneys, Wallison & Wallison LLP, along with the terms of its engagement of that firm; and

WHEREAS the Republic, after review of those records and terms, is satisfied that an award of \$300,000 for attorney’s fees and costs incurred in this action is a “reasonable” amount of attorney’s fees and costs considering the relevant factors for an award of attorney’s fees and costs;

IT IS HEREBY STIPULATED AND AGREED BETWEEN THE PARTIES, BY AND THROUGH THEIR UNDERSIGNED COUNSEL, AND ORDERED BY THE COURT, AS FOLLOWS:

1. That judgment for attorney’s fees and costs in the amount of \$300,000, plus post-

judgment interest as set forth in 28 U.S.C. § 1961(a), be granted to Casa Express and against the Republic; and

2. That Casa Express, within seven days of the date the Court enters this stipulation and proposed order, shall submit a proposed amended Judgment consistent with this stipulation and proposed order.

Dated: New York, New York
November 19, 2020

WALLISON & WALLISON LLP

/s/ Jeremy Wallison

Jeremy L. Wallison, Esq.
jw@wallisonllp.com
20 East 69th Street, Suite 5A
New York, New York 10021
(212) 292-1011

*Counsel for Casa Express Corp,
as Trustee of Casa Express Trust*

ARNOLD & PORTER KAYE SCHOLER LLP

/s/ Kent Yalowitz

Kent A. Yalowitz, Esq.
Kent.Yalowitz@arnoldporter.com
250 West 55th Street
New York, New York 10019
(212) 836-8000

*Attorneys for the Bolivarian Republic of
Venezuela*

SO ORDERED:

Analisa Torres, U.S.D.J.